

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

Emily Doe,)	Civil Action No.: 4:20-cv-04445-JD
)	
Plaintiff)	
vs.)	
)	
American University of Antigua, Inc.,)	AFFIDAVIT OF EMILY DOE
)	
Defendant.)	
)	

Personally appeared before me a person whose identity is known to me to be Emily, who identifies herself as the actual person who has petitioned to appear in this action using a pseudonym, who being sworn by me¹ deposes and says that:

1. I am over the age of eighteen (18) years and am competent to state the matters set forth herein. I have personal knowledge of the matters stated, except those matters which are stated on information and belief, and as to those, I have a good faith basis for believing them to be true.
2. I applied for admission to Defendant AUA on or about April 2016, listing my permanent home address at my residence in Myrtle Beach, South Carolina. I have remained a resident of South Carolina throughout my education at AUA.
3. I have arranged temporary residence in Antigua or elsewhere when coursework required that I be someone other than South Carolina, but at no time since I became a student at Defendant AUA have I changed my permanent address away from South Carolina.

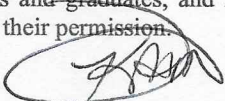
¹ Notary public verify here that legal identification for a licensed South Carolina driver with the first name Emily was shown. *[Signature]*

ED



4. I maintain an active South Carolina driver's license.
5. I have had two (2) classmates while at AUA who advise they are also residents of South Carolina. One is identified by her initials A.G². and the other is identified by her initials H.J.
6. In 2020, I did two rotations at Grand Strand Medical Center in Myrtle Beach, through what I was advised by Defendant AUA was a contract between AUA and Grand Strand. I completed an internal medicine rotation in August 2020, and anesthesia rotation in September, 2020.
7. While doing my rotation at Grand Strand, I was well acquainted with two graduates of AUA one of whom I understand is an attending physician and one is a resident. Their names are N. A. and J. C. Both are admitted to practice in South Carolina, and redacted copies of their official licensure information is attached to this Affidavit as **Exhibits 1 and 2.**
8. I am informed and believe that current online information for the College of Medicine at University of South Carolina shows a current fellow who is a graduate of Defendant AUA with the initials K.J.
9. I am informed and believe that current online information for the AUA Alumni Directory at www.aualumn.org shows a graduate of Defendant AUA whose initials are B.V. who was referred for employment by the AUA Alumni Referral Program and is currently employed as Founding Association program Director Interim Medical

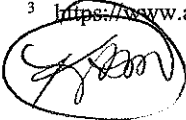
² I use initials because I believe this will provide sufficient information for Defendant AUA to identify the students, residents and graduates, and I don't want to share private information concerning my classmates and colleagues without their permission.



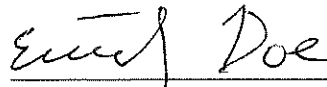
Director of Tidelands Medical University of South Carolina (MUSC) Family Medicine Residency Program in Murrells Inlet, South Carolina. Her online information also identifies her as an Assistant Professor of Family Medicine and an Attending Physician at MUSC in Charleston, South Carolina.

10. The AUA Alumni Residency Placement website and the AUA website³ lists residency placements for AUA graduates as follows:
 - a. 2020 – two AUA graduates placed for residency in South Carolina, one at Grand Strand Medical Center and one at Prisma Health, University of South Carolina School of Medicine in Greenville.
 - b. 2019 – two AUA graduates placed for residency in South Carolina, one at Grand Strand Regional Medical Center and one at Prisma Health-Midlands/University of South Carolina School of Medicine in Columbia.
 - c. 2017 – three AUA graduates placed for residency in South Carolina, two at Grand Strand Medical Center and one at Tidelands Health, which has locations in Murrells Inlet and Georgetown, South Carolina.
 - d. 2016 – one AUA graduate placed for residency in South Carolina at Grand Strand Regional Medical Center.
 - e. 2015 – four AUA graduates placed for residency in South Carolina, two at Grand Strand Regional Medical Center, one at Greenville Hospital System/University of South Carolina School of Medicine and one at Spartanburg Regional Healthcare System.
 - f. 2014 – three AUA graduates were placed for residency in South Carolina, two at Greenville Hospital System/University of South Carolina School of Medicine, one in general surgery and one in family medicine. The third was placed at Palmetto Health Richland.

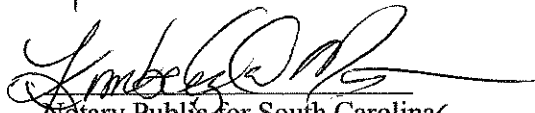
³ <https://www.auaalumni.org/residency/> and <https://www.auamed.org/graduate-success/residency-placements/>



- g. 2013 – one AUA graduate was placed for residency in South Carolina at Spartanburg Regional Healthcare.
 - h. 2011 – two AUA graduates were placed for residency in South Carolina, one at AnMed Health and another at Greenville Hospital System/University of South Carolina School of Medicine.
 - i. Graduate residence placements for 2007-2010 graduates are shown in a single list, reflecting three residence placements at AnMed Health in Anderson, South Carolina, one at McLeod Regional Medical Center in Sumter, and two at Spartanburg Regional Healthcare Systems.⁴
11. In the event the continuous relationships between South Carolina institutions as set forth herein and on Defendant's online information is insufficient to establish sufficient minimum contacts at this preliminary stage of the litigation, I request permission to conduct limited discovery for determining the merits of Defendant AUA's Motion to Dismiss, as set forth in my response filed herewith.


Emily Doe Emily Doe

Sworn to before me this
4 day of March, 2021.


Notary Public for South Carolina
My commission expires: 10/24/2024

⁴ The AUA Alumni Residence Placement website does not list residency placements for AUA graduates prior to 2007.

3/4/2021

Medical Board

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**South Carolina Board of Medical Examiners
Website Verification**

Grand Strand Medical Center
809 82ND PARKWAY
MYRTLE BEACH, SC 29572

Name: N [REDACTED]
A [REDACTED]

Profession: MD

Office Phone:

Basis:

School: AUA

Graduation:
09/30/2019

License No: LL84261

Date Issued:
07/01/2020

Expiration: 06/30/2021

Specialty: *INTERN

Rx#:

Rx Issue Date:

Primary Source Verification of Graduation Certified

Hospital Affiliation (s): None

Credential Status: Active

No disciplinary action taken by the Board. This certifies that the above licensee is in good standing.

Board Public Action History:
[View Orders](#)
[View Other License for this Person](#)

No Orders Found

License History:

No other licenses on record.

[Verification disclaimer](#)

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3/4/2021

Medical Board

[Print this page](#)**Board: Medical Board****South Carolina Board of Medical Examiners
Website Verification**

Name: J [REDACTED] C [REDACTED] Profession: MD Office Phone:
Basis: 2018 School: AUA Graduation: 01/09/2015
License No: 39725 Date Issued: 04/02/2020 Expiration: 06/30/2021
Specialty: IM
Rx#: Rx Issue Date:

Primary Source Verification of Graduation Certified**Hospital Affiliation (s):** None**Credential Status:** Active

No disciplinary action taken by the Board. This certifies that the above licensee is in good standing.

Board Public Action History:[View Orders](#)[View Other License for this Person](#)[No Orders Found](#)

3/4/2021

Medical Board

License History:

Limited License Number: 39725

Limited License Issue Date: 06/24/2016

[Verification disclaimer](#)

[File a Complaint against this licensee](#)